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VIA ECF


The Honorable Jesse M. Furman
United States Courthouse
Southern District of New York
40 Foley Square, Room 2202
New York, NY 10007

Re: Torre et al. v. Charter Communications, Inc.; 19-cv-5708 (JMF) ("Torre")
Perez et al. v. Charter Communications, Inc.; 19-cv-7141 (JMF) ("Perez")

Dear Judge Furman,

We represent Plaintiffs in the *Torre* and *Perez* actions and write in response to both the Court's August 8, 2019 order and Defendant's letter dated August 13, 2019. While these actions contain substantial overlap such that coordination of both matters before Your Honor will promote judicial economy and efficient use of party resources, we agree with Defendant's conclusion (though we do not agree with the assertions in the letter) that full consolidation is inappropriate. We cannot comment on Defendant's claim that it intends to force Plaintiffs Thalia Perez and Michelle Greenstein to pursue their claims in a private arbitration outside the public view rather than before a jury of their peers, as this intention was never previously brought to our attention and we have not been presented with any arbitration agreements to review or consider. If a motion to compel arbitration is filed, we will respond accordingly.

Respectfully Submitted,



David E. Gottlieb